

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	Criminal No. 05-10102-JLT
)	
JOHN BRUENS, MARY STEWART, MARC)	
SIROCKMAN, MELISSA VAUGHN)	
)	
Defendants.)	

**ASSENTED TO MOTION OF DEFENDANT MARC SIROCKMAN
FOR MODIFICATION OF ORDER SETTING CONDITIONS OF RELEASE**

Defendant Marc Sirockman hereby requests that this Court modify its Order Setting Conditions of Release so as to allow Mr. Sirockman to travel to Ontario, Canada, July 03-July 10 for a family vacation. In support of this Motion, Mr. Sirockman states as follows:

1. On May 25, 2005, this Court entered its Order Setting Conditions of Release which allowed, among other things, Mr. Sirockman to maintain his passport and to travel internationally on business, provided that he file an itinerary with Pretrial Services in advance of business travel. He has been to Canada and back many times on business since that date;

2. Mr. Sirockman wants to take his yearly family vacation to Lake Nipissing, Lake Ontario, Canada to take his sons fishing from July 3 to July 10, 2005. If this Motion is allowed, Mr. Sirockman will travel to Lake Nipissing in Ontario and will stay at Glen Echo Cottages on the lake;

3. Mr. Sirockman hereby requests that the Court modify its Order so as to allow Ms. Sirockman to travel to Ontario, Canada for this family vacation. Mr. Sirockman will depart for Canada by car on July 3 and return by car to his home in the United States on July 10, 2005;

4. Assistant United States Attorney Mary Beth Carmody has stated the government's assent to this motion.

WHEREFORE, Mr. Sirockman respectfully requests that this Court modify its Order Setting Conditions of Release as set forth above.

Respectfully submitted,

MARC SIROCKMAN,

By his attorneys,

/s/ Tracy A. Miner
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Dated: June 9, 2005

Local Rule 7.1(A)(1) Certification

I hereby certify that this Motion has been previously discussed by defense counsel with counsel for the Government. AUSA Carmody has assented to this Motion.

/s/ Tracy A. Miner
Tracy A. Miner

Certificate of Service

This is to certify that a copy of the foregoing motion was served via first class mail on this 9th day of June 2005 to counsel for the government:

/s/ Tracy A. Miner
Tracy A. Miner

LIT 1525424v1